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Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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	:	
In re:	:	Chapter 11
	:	
MONTAUK CLIFFS, LLC,	:	Case No. 22-70312 (REG)
	:	
	:	
Debtor.	:	
	:	
-----	X	

**CERTIFICATE OF NO OBJECTION TO MOTION  
FOR ENTRY OF FINAL DECREE**

TO THE HONORABLE ROBERT GROSSMAN,  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. §1746, the undersigned counsel hereby certifies as follows:

1. On October 25, 2022, the undersigned counsel for the Debtor filed and caused to be served the Motion for Entry of Final Decree (the “Motion”) [Docket No. 89].
2. Pursuant to E.D.N.Y. LBR 9006-1, responsive papers were to be filed and served so that they were actually received no later than November 28, 2022 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

3. The Objection Deadline has passed and no objections or other responsive pleadings to the Motion have been received by the Movant or filed with the Court. Accordingly, the Court may enter the proposed final decree without need for a hearing.

4. Due to the foregoing, it is respectfully requested that the Court enter the Final Decree annexed to the Motion, a copy of which is attached hereto as Exhibit "A".

Dated: November 29, 2022  
Garden City, New York

CULLEN AND DYKMAN LLP  
Attorneys for Debtor

By: /s/Bonnie L. Pollack  
Mathew G. Roseman, Esq.  
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EXHIBIT A

Proposed Final Decree

Upon the motion dated October 25, 2022 (the “Application”) of Montauk Cliffs, LLC, debtor in the above-captioned chapter 11 case (the “Debtor”), through its attorneys Cullen and Dykman LLP, seeking entry of a Final Decree; and this Court having entered an Order dated August 12, 2022 (the “Confirmation Order”) confirming the Second Amended Chapter 11 Plan filed by the Debtor (the “Plan”); and the Debtor having stated in the Application that the Plan has been substantially consummated, and having applied for this Final Decree; and it appearing to the satisfaction of the Court that the Plan has been substantially consummated, and after due deliberation and sufficient cause appearing therefore; and with capitalized terms used herein but not otherwise defined having the meanings ascribed to them in the Application; it is hereby

ORDERED AND DECREED:

1. Within ten (10) days of entry of this Final Decree, the Debtor shall file its final operating report for any remaining months.
2. Within three (3) business days of being advised by the Office of the United States Trustee of the outstanding quarterly fees due and owing by the Debtor, such fees shall be paid.
3. Pursuant to section 350(a) of the Bankruptcy Code and Rule 3022 of the Federal Rules of Bankruptcy Procedure, the above-captioned case is hereby closed, subject to this Court's continued jurisdiction with respect to such matters as may be prescribed under the Plan, the Confirmation Order, this Final Decree and as provided for under the Bankruptcy Code.